REMARKS

1.   Introduction

In the final Office Action mailed August 15, 2005, with claims 1-24 pending, the Examiner (i) rejected claims 1-2, 5, 9, 13-14, 17-18, and 21-24 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,856,624 (Magret); (ii) rejected claims 3, 4, 6, 10, 11, and 19 under 35 U.S.C. § 103(a) as being unpatentable over the combination of Magret and U.S. Patent 6,466,964 (Leung); (iii) rejected claim 8 under 35 U.S.C. § 103(a) as being unpatentable over the combination of Magret and Farinacci, "RFC 2784 – Generic Routing Encapsulation (GRE)." (RFC 2784); (iv) rejected claims 7, 12, 15, 16, and 20 under 35 U.S.C. § 103(a) as being unpatentable over the combination of Magret and U.S. Patent Application 2002/0021681 A1 (Madour); and (v) indicated that the arguments made in Applicant's Response to the Office Action mailed January 11, 2005 have been considered but are now moot.

In this Response, Applicants have amended claims 1, 5, 7, 9-11, 13, 16, 17, and 21-24 and have canceled claims 3, 4, 6, 19, and 20.

For the reasons set forth below, Applicants respectfully request reconsideration and allowance of the claims as amended herein.

2.   Response to Examiner's Claim Rejections

a.   Independent Claims 1, 17, 23, and 24; Dependent Claims 2 and 18

The Examiner rejected independent claims 1, 17, 23, and 24 under 35 U.S.C. § 102(e) as anticipated by Magret. In this Response, Applicants have amended claims 1, 17, 23, and 24 to recite "wherein identifying the connection using the tunnel identifier comprises using the tunnel identifier to identify an entry in a tunnel table and using the entry in the tunnel table to identify an entry in a connection table, wherein the entry in the connection table identifies the

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connection." Applicants submit that Magret does not disclose this step, and thus does not anticipate any of amended claims 1, 17, 23, and 24.

Instead of separate and distinct tunnel and connection tables, Magret discloses using a visitor cache 44. Specifically, Magret teaches that, "[f]or each mobile node registered or pending to be registered, the visitor cache 44 preferably includes the mobile node's link-layer source address, home address, temporary address (if assigned), home agent address, lifetime information, and the like." Magret, column 7, lines 4-8. Thus, visitor cache 44 is essentially a conventional Mobile-IP visitor list, with the addition of temporary IP addresses in cases where mobile nodes have been assigned such addresses.

Moreover, Magret does not disclose any sequence whereby a first value (such as a tunnel identifier) is used to identify an entry in a first table (such as a tunnel table), and then the identified entry in the first table is used to identify an entry in a second table (such as a connection table). In Magret's system, visitor cache 44 would be queried with a mobile node's private, home, or temporary IP address to identify the mobile node's "link-layer source address" (i.e., connection). This does not amount to the tunnel-table, connection-table sequence of amended claims 1, 17, 23, and 24. Thus, Magret does not anticipate these claims.

Like Magret, neither Leung nor Madour teach two tables such as the tunnel table and connection table, nor does either reference teach any sequence whereby a first value is used to identify an entry in a first table, and then the identified entry in the first table is used to identify an entry in a second table, where that entry in the second table identifies a connection with a mobile node. Leung, rather, teaches a conventional Mobile-IP visitor list, and teaches using both a mobile node's home address and home agent address to identify a connection to a mobile node. See Leung, figure 6, column 13, lines 26-34. Madour is directed to handoff in radio

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telecommunications networks, and was cited by the Examiner only for the concept of implementing a connection with a mobile node using the Point-to-Point Protocol (PPP).

Accordingly, Applicants submit that claims 1, 17, 23, and 24 are allowable over Magret, Leung, and Madour for at least the foregoing reasons. Applicants further submit that claims 2 and 18 are allowable for at least the reason that they depend from allowable claims.

b.   Independent Claims 5 and 21; Dependent Claims 7 and 8

The Examiner rejected independent claims 5 and 21 under 35 U.S.C. § 102(e) as anticipated by Magret. In this Response, Applicants have amended claims 5 and 21 to recite "wherein using the tunnel identifier to identify the connection for packets having the tunnel identifier comprises using the tunnel identifier to identify an entry in a tunnel table and using the entry in the tunnel table to identify an entry in a connection table, wherein the entry in the connection table identifies the connection."

As noted above in section 1a, Magret, Leung, and Madour fail to teach two separate and distinct tables, and fail to teach a sequence of identifying an entry in one of those two tables, and then using that entry to identify an entry in the other table that identifies a connection with a mobile node. Accordingly, Applicants submit that claims 5 and 21 are allowable for at least the reasons set forth in section 1a. Applicants further submit that claims 7 and 8 are allowable for at least the reason that they depend from allowable claims.

c.   Independent Claims 9 and 22; Dependent Claims 10-12

The Examiner rejected independent claims 9 and 22 under 35 U.S.C. § 102(e) as anticipated by Magret. In this Response, Applicants have amended claims 9 and 22 to recite "wherein translating the identifier into the connection comprises using the identifier to identify

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an entry in a tunnel table and using the entry in the tunnel table to identify an entry in a connection table, wherein the entry in the connection table identifies the connection."

As noted above in section 1a, Magret, Leung, and Madour fail to teach two separate and distinct tables, and fail to teach a sequence of identifying an entry in one of those two tables, and then using that entry to identify an entry in the other table that identifies a connection with a mobile node. Accordingly, Applicants submit that claims 9 and 22 are allowable for at least the reasons set forth in section 1a. Applicants further submit that claims 10-12 are allowable for at least the reason that they depend from an allowable claim.

d. Independent Claim 13; Dependent Claims 14-16

The Examiner rejected independent claim 13 under 35 U.S.C. § 102(e) as anticipated by Magret. In this Response, Applicants have amended claim 13 to recite "wherein the PDSN translating the tunnel identifier into information representative of the connection comprises the PDSN using the tunnel identifier to identify an entry in a tunnel table and using the entry in the tunnel table to identify an entry in a connection table, wherein the entry in the connection table identifies the connection."

As noted above in section 1a, Magret, Leung, and Madour fail to teach two separate and distinct tables, and fail to teach a sequence of identifying an entry in one of those two tables, and then using that entry to identify an entry in the other table that identifies a connection with a mobile node. Accordingly, Applicants submit that claim 13 is allowable for at least the reasons set forth in section 1a. Applicants further submit that claims 14-16 are allowable for at least the reason that they depend from an allowable claim.

3.   Conclusion

Applicants submit that all of the pending claims are now in condition for allowance. Therefore, Applicants respectfully request favorable action. Should the Examiner have any questions, the Examiner is encouraged to contact the undersigned at 312-913-0001.

Respectfully submitted,

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